

June 25, 2006



Federal Trade Commission
Office of the Secretary, Room H-135 (Annex W)
600 Pennsylvania Avenue, NW
Washington, DC 20580

RE: Business Opportunity Rule, R511993

Dear Sir:

I very much appreciate the Federal Trade Commission's consumer protection mission. But I am concerned that the proposed Business Opportunity Rule R511993 will hurt legitimate direct selling companies, consultants, and distributors. Some of the sections in the proposed rule would make it very difficult for these companies and their associates to sell products.

The proposed seven-day waiting period is most troubling. To wait seven days to enroll new distributors and consultants suggests that there may be something wrong with the company's plan. New distributors can go to a store to purchase items they want without signing up and waiting seven days to make their purchases. Most direct selling companies have a buyback policy for sales kits and products they market through distributors and consultants.

Having a waiting period before purchases would be allowed would necessitate having the consultants and distributors keep very detailed records and then having to send in many reports to their companies.

Another way that direct selling companies and their distributors and consultants are put at an unfair advantage by the proposed rule is the section that calls for the release of any information regarding lawsuits involving misrepresentation or unfair or deceptive practices, whether or not the companies have been found guilty. In this time when anyone or any company can be sued for almost anything, that would also put direct selling companies and their distributors and consultants at an unfair advantage even though the companies have done nothing wrong.

And having to disclose a minimum of 10 prior purchasers nearest to the prospective purchaser is an invasion of the privacy of the prior purchasers, and would also discourage the purchases of others. Such information could easily damage the business relationship of the references who might be involved in other companies or businesses. Also to obtain the list of prior purchasers would involve another waiting period. Most people are very concerned about their privacy and identity theft, and would not want to share their personal information with people they do not know.

I have been a consultant and distributor for several companies for about ten years. I use the income I make to help my favorite charities and non-profit organizations, which I would be unable to do on my family's regular income. I want to continue to offer the products and services of these companies and to help others make extra income too.

Thank you for considering my comments on the proposed rule.

